

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -	-X	:	
UNITED STATES OF AMERICA	:	:	<u>SUPERSEDING INFORMATION</u>
- v. -	:	:	S1 21 Cr. 708 (PGG)
ENRIQUE FIGUEROA,	:	:	
Defendant.	:	:	
- - - - -	-X	:	

COUNT ONE
(Conspiracy to Commit a Federal Offense)

The United States Attorney charges:

1. From at least in or about August 2021 up to and including in or about September 2021, in the Southern District of New York and elsewhere, ENRIQUE FIGUEROA, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree, together and with each other, to commit an offense against the United States, to wit, interstate threats, in violation of Title 18, United States Code, Section 875(c).

2. It was a part and an object of the conspiracy that ENRIQUE FIGUEROA, the defendant, and others known and unknown, would and did knowingly and intentionally transmit in interstate and foreign commerce a communication containing a threat to injure the person of another.

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York and elsewhere:

a. On or about August 22, 2021, ENRIQUE FIGUEROA, the defendant, then a resident of Manhattan, New York, posted on Facebook a Spanish-language video in which he threatened to injure another person.

(Title 18, United States Code, Section 371.)



DAMIAN WILLIAMS
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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Defendant.

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(18 U.S.C. § 371)

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